

DOCKET NO.: **GP-0005

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: **Hiang-Swee Chiang** Confirmation No.: **1362**
Serial No.: **09/812,634** Group Art Unit: 2135
Filing Date: **March 20, 2001** Examiner: **Beemnet W. Dada**
For: **Transparent User And Session Management For Web Application**

Mail Stop Appeal-Brief Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

APPELLANT'S REPLY BRIEF PURSUANT TO 37 C.F.R. § 41.41

This Reply Brief is filed in response to Examiner's Answer mailed December 13, 2007, and in further support of Appellant's appeal from the rejections of claims 1 through 78 dated May 31, 2006. A Notice of Appeal was filed on November 30, 2006 and an Appeal Brief was submitted March 6, 2007 (and resubmitted on October 24, 2007).

The Office is hereby authorized to charge Deposit Account No. 23-3050 for any fee that may be due. The Commissioner is hereby requested to grant an extension of time for the appropriate length of time, should one be necessary, in connection with this filing or any future filing submitted to the U.S. Patent and Trademark Office in the above-identified application during the pendency of this application.

I. STATUS OF CLAIMS

A. Total Number of Claims in Application

There are seventy-eight (78) claims pending in this application.

B. Current Status of Claims

Claims 1 through 78 are pending. Claims 1 through 78 stand rejected.

C. Claims On Appeal

Claims 1 through 78 are on appeal.

II. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Whether the rejection of claims 1, 3-10, 12-20, 22-29, 31-38, 40-49, 51-59, 61-69 and 71-78 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Wood (US Patent No. 6,668,322 B1) in view of Zhao (US Patent 6,035,404) is proper.

Whether the rejection of claims 2, 11, 21, 30, 39, 50, 60 and 70 as being unpatentable over Wood in view of Zhao and Gupta (US Patent No. 6,226,752) is proper.

III. ARGUMENT

Appellant respectfully submits that the Examiner's Answer fails to establish that all of the recited claim language is taught by the cited references. Accordingly, the Examiner has failed to establish a prima facie case of obviousness under 35 U.S.C. §103(a).

A. Background Of The Disclosed Embodiments

In the patent specification, Appellant notes several features of existing systems:

The stateless nature of Hyper-Text Transfer Protocol (HTTP) is a disadvantage of any web application that runs on a server computer connected to a network and which uses HTTP to communicate with client web browsers. This is because the HTTP protocol is generally a stateless request/response protocol. That is, *for every request generated by a user, the web application provides a response which typically includes one or more variables used by the application to identify the user and/or the session*. In order to accomplish user and/or session management, these variables are returned with a subsequent request by the user. Without that, the HTTP protocol does not inform the server whether a series of consecutive requests are coming from the same web browser and/or user or different web browsers and/or users.

...

For any web application which uses HTTP protocol to communicate with a web browser, it is very important to ascertain whether consecutive requests come from the same web browser and/or user. To enable session as well as user management, prior web applications were designed to send one or more cookies as part of an initial response to a web browser. In turn, a web browser was required to return one or more cookies as part of the subsequent request.

...

[B]oth software libraries and session objects have also been used to enable web applications to manage different users and/or sessions. The first approach provides *two variables to a web application for each request to identify the session and user*. The web application can then use either hash tables in memory, files on a file system or tables in a database system to keep the application states associated with each session and user.

In contrast to these existing methods wherein *multiple* variables are used to identify the session and user, Appellant's claim a method for performing user and session management comprising "receiving a first request from a user for an application instance, the request including **a single identifier used to identify both a session and a user for all user requests without further user and session application variables.**"

B. The Claim Language

Representative claim 1 recites:

1. A method for performing user and session management over a computer network, comprising:
receiving a first request from a user for an application instance, **the request including a single identifier used to identify both a session and a user for all user requests without further user and session application variables;** and
transmitting an application instance response to the user based on stored user and session system information.

C. The References Do Not Teach The Recited Claim Language

The Examiner's Answer attempts to read the cited references on selected portions of the application *specification*. (See Answer, pp. 19-20).¹ Appellants respectfully submit that the Examiner's comparisons of the cited references to the *application specification* are not relevant. Rather, the appropriate analysis is that relating to the *actual claim language* relative to the cited references. The combinations recited in the claims are *not* taught or suggested by the cited references.

In previous communications relating to the present application, including the Final Office Action issued May 31, 2006, the Examiner has acknowledged that Wood (U.S. Patent 6,668,322) "is silent on a single identifier used to identify both a session and a user." Indeed,

¹ For purposes of clarifying ambiguity, we note that one of the quotes of the application specification that appears in the Examiner's Answer does not comprise all of the relevant language. In particular, the quote from page 13, lines 21 through 24 of the application (referenced on page 20 of the Answer) reads in its entirety as follows: "if authentication is successful, the runtime environment returns a redirection response to the original request URL together with a single cookie (also referred to herein as the JLVSession cookie, which may contain a static unchanging value) **that includes a random number generated by the central server 18 via random number generator 21 for uniquely identifying the user and the session** (step 407)." (emphasis added).

at page 3 of the Answer, the Examiner again concedes this point. Nevertheless, in the Response to Argument section of the Answer, the Examiner *now* alleges “Wood teaches a session cookie, that identifies a user (session ID & principal Id, see figure 4 session credentials 420 and session cookie 430) and that also identifies a session (session Id & Date creation /expiration time, see figure 4 session credentials 420 and session cookie 430).” (Answer, p. 20). It is respectfully submitted that, in fact, Wood teaches a system of the type that Applicants sought to improve upon. In particular, Wood teaches using two separate identifiers, “session id” and “principal id,” to identify a session and a user. (Wood, col. 8, ll. 9-25). Wood also describes that there are *additional* user session and application variables, namely, “a trust level, group ids, a creation time, and expiration time.” In contrast, claim 1 recites “**the request including a single identifier used to identify both a session and a user for all user requests without further user and session application variables.**” Not only does Wood not teach “the request including a *single* identifier,” but it also fails to teach “*without* further user and session application variables.” It is respectfully submitted that the Examiner’s assertion that Wood teaches “the request including a single identifier for all user requests without further user and session application variables” is not supported by the disclosure.

In response to Appellant’s Appeal Brief in which it was illustrated that Zhao likewise fails to teach “**the request including a single identifier used to identify both a session and a user for all user requests without further user and session application variables.**” the Answer now asserts that “Examiner used Zhao’s reference to show the teachings of a single identifier that is used to identify both a user and a session (i.e. session ID, stored in a database lookup table with other user and session information . . .)” (See Answer, p. 21). Thus, the Answer now concedes that similar to Wood, Zhao also does not teach or suggest “**the request including a single identifier . . . for all user requests without further user and session application variables.**” Accordingly, the Examiner has failed to illustrate that the recited claim language existed anywhere in the prior art.

Even assuming that the Examiner had met its burden to show that Wood or Zhao taught “**the request including a single identifier . . . for all user requests without further user and session application variables.**” (which it has not), Zhao does not teach “a single identifier that is used to identify both a user and a session” as alleged. (See Answer, p. 21). The session ID taught by Zhao is not a single identifier used to identify both a user and a

session. Figure 6 and the referenced sections of Zhao disclose a state lookup table 24. According to Zhao, “[w]hen a user attempts to log on, the state lookup table is used for various functions, such as recording session ID’s, active users, and determining the status of logins already in progress.” (Zhao, Col. 5, ll. 40-43). Zhao further explains that “each session, which is established after a user login, has an entry created in the table. A session ID 48 is generated dynamically for a session.” (Zhao, Col. 5, ll. 47-50). “The internal user ID (IUID) for the session is also entered into the state lookup table. The IUID is obtained from the user profile data in the same manner as the user mask.” (Zhao, Col. 5, ll. 54-56). “Both are obtained when the user accomplishes the normal login procedure, such as entering his own user ID and password successfully.” (Zhao, Col. 5, ll. 56-59).

Thus, Zhao teaches receiving *user ID’s and passwords*. Zhao teaches that the session ID, which is relied upon to support the rejection, is **not** received in a user request. Rather, Zhao teaches that the session ID is ***generated and maintained internally*** in the state lookup table.

Furthermore, Zhao does **not** teach that the session ID identifies **both** a session and a user. To the contrary, Zhao discloses in the state lookup table 24 of Figure 6, that each session ID is stored in relation to an internal user ID. It is entirely possible that the session ID’s taught by Zhao could be repeated between users. For example, a session ID 001001 could be associated with user interface ID 1000, but may also be associated with internal user interface ID 1001.

Therefore, Wood and Zhao, even in combination, do not disclose or suggest “**the request including a single identifier used to identify both a session and a user for all user requests without further user and session application variables.**”

Moreover, even assuming that Wood and Zhao could possibly be arranged to result in the recited claim language (which they can not), one of ordinary skill would *not* be motivated to make such a combination. The Examiner’s Answer asserts that “[o]ne of ordinary skill in the art at the time of applicant’s invention could have been motivated to employ the teachings of Zhao with the system of Wood in order *to properly permit access to system applications thereby enhancing security of the system.*” (Answer, p. 23). Appellant respectfully disagrees. The systems and methods disclosed by Wood *already* “permit access to system applications.” The motivation to “properly permit access to system applications” *had been satisfied*. Therefore, because the need to permit access to system applications had already been

satisfied, even if it were possible to do so, one skilled in the art would have no motivation to combine Wood with Zhao to arrive at the claimed combination.

Indeed, Wood **actually teaches away** from combining to form the recited combination. At column 8, lines 9-25, Wood describes using *two separate identifiers* within a session to identify the session and the user. In particular, Wood teaches using “session id” and “principal id.” Also, Wood describes that there are additional user session and application variables, namely, “a trust level, group ids, a creation time, and expiration time.” In Wood, the trust level is associated with the unique principal id and “serves as a basis for evaluating whether a *principal* associated with the session credentials has been authenticated to a sufficient level...” (emphasis added) (Col. 8, lines 26-30). If the same id were used for the session and user, it would not be possible to evaluate user authentication using the trust level, as required by Wood. Modifying Wood to include the “single identifier” and not a trust level would render Wood unsatisfactory for this intended purpose. Accordingly, not only is there not a motivation to combine Wood with Zhao, but Wood actually teaches away from a combination such as that recited in claim 1.

D. Conclusion

Therefore, because neither Wood nor Zhao teach all of the recited claim language, the references cannot be combined to form the recited combination of claim 1 and all claims depending therefrom. *See* M.P.E.P. § 2143.03. Furthermore, even if Wood or Zhao taught the recited language of the claims, there is no motivation to combine the references to form the recited combination. For similar reasons, independent claims 7, 8, 9, 10, 17, 18, 19, 20, 26, 27, 28, 29, 35, 36, 38, 44, 45, 46, 47, 55, 56, 57, 58, 65, 66, 67, 68, 75, and 77, and all claims depending therefrom are patentable over the cited references. Withdrawal of the rejections under 35 U.S.C. § 103(a) is respectfully requested.

DOCKET NO.: **GP-0005

PATENT

Applicant respectfully submits that the rejection of claims under 35 U.S.C. § 103(a) was improper. For the all of the foregoing reasons, Applicant respectfully requests that the Board reverse the rejections.

Date: February 13, 2008

/John E. McGlynn/
John E. McGlynn
Registration No. 42,863

Woodcock Washburn LLP
Cira Centre
2929 Arch Street, 12th Floor
Philadelphia, PA 19104-2891
Telephone: (215) 568-3100
Facsimile: (215) 568-3439